

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CORPORAL TRINIDAD NAVARRO,	:	
	:	
Plaintiff,	:	C.A. No. 05-565 GMS
	:	
v.	:	JURY TRIAL DEMANDED
	:	
CHRISTOPHER A. COONS,	:	
individually and in his official capacity;	:	
GUY H. SAPP, individually and in his	:	
official capacity; and NEW CASTLE	:	
COUNTY, a municipal corporation,	:	
	:	
Defendants.	:	

**MOTION FOR EXTENSION OF TIME  
TO FILE PRETRIAL STATEMENT**

1. This is an application made by all parties in this litigation to extend the time for the filing of the Pretrial Stipulation and associated documents. The current date for the submission of the Pretrial Stipulation is October 23, 2006.
2. The parties request an extension until November 8, 2006, to file these items.
3. The parties propose that Plaintiff will forward to counsel for Defendants a draft of the Pretrial Stipulation containing the information Plaintiff proposes to include in the draft by October 25, 2006. Counsel for Defendants shall, in turn, provide to Plaintiff's counsel any comments on the Plaintiff's draft, as well as the information Defendants propose to include in the proposed Pretrial Stipulation, by November 3, 2006.
4. The trial date is currently scheduled for December 4, 2006.
5. Defendants filed a Motion for Summary Judgment on July 17, 2006.

6. Plaintiff filed a Motion For Leave To Amend Complaint on August 1, 2006.

7. Defendants filed their opposition to Plaintiff's Motion For Leave To Amend Complaint on August 14, 2006.

8. Both Motions are pending.

9. In view of the uncertain status of this matter and the pending motions, the parties believe that it is prudent to request further time to file the pretrial papers in this matter.

Respectfully submitted,

**MARGOLIS EDELSTEIN**

*/s/ Jeffrey K. Martin*

Dated: October 18, 2006

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**NEW CASTLE COUNTY LAW  
DEPARTMENT**

*/s/ Michele D. Allen*

Dated: October 18, 2006

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*/s/ Jeffrey S. Goddess*

Dated: October 18, 2006

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